

Clearstream Fund Centre S.A.  
Luxembourg (CFCL)

## Management of conflicts of Interests

January 2023

<b>Deutsche Börse Group</b>	Page: 2 / 4
<b>Management of conflicts of interests</b>	Date: 2 January 2023

## 1. Introduction

The summary of the conflict of interests policy below outlines how Clearstream Fund Centre S.A. Luxembourg (hereafter CFCL) will identify and manage any actual and potential conflict of interests that may arise through providing services to CFCL's customers. Any breach of the following obligations could constitute criminal offense. This document is a summary for customers under Articles 16, 18 and 23 of MiFID II and Articles 33-43 and 91 of MiFID Delegated Regulation.

## 2. Definitions

Based on the groups experience, conflicts of interests may arise in situations in which the interests of one party of the conflict interferes with the interests of another party to the conflict impairing their ability to act fairly, transparently and ethically for example:

- (1) The interests of CFCL or Deutsche Börse Group (DBG) or one of its legal entities interfere with the interests of Third Parties.
- (2) The interests of one customer of CFCL or DBG or one of its legal entities interfere with interests of another customer of DBG or one of its legal entities.
- (3) An employee's own interests which originate from a source beyond his or her professional obligations interfere with his or her objectivity to make decisions.
- (4) The members of the management body interfere with one or more third parties.

## 3. Obligations

The main legal requirements can be found in the Regulatory requirements on European level deriving from for example the directive on markets in financial instruments (MiFID II), the regulation on OTC derivatives, central counterparties and trade repositories (EMIR), the regulation on improving securities settlement in the European Union and on central securities depositories (CSDR), local regulatory requirements deriving from for example, the German securities trading act, the Luxembourg law on financial sector.

CFCL has and makes the necessary efforts to avoid and mitigate any conflicts of interests. Conflict of interest can become a serious legal, regulatory and reputational issue if not identified and managed effectively.

Conflicts of interests may include personal, professional or economical relationships with other persons such as:

- (1) Secondary employment/external mandates.
- (2) Further internal mandates and roles within CFCL or DBG.
- (3) Financial interests.
- (4) Interests of persons closely associated (for example, family members).

Corporate conflicts of interest may arise in the following context:

- (1) When relationships between different CFCL/DBG areas/DBG entities are following different mandates and strategies
- (2) Fee arrangements with respect to the service provided by one CFCL or DBG entity to another or to a customer.
- (3) Services to customers, in which CFCL or DBG takes up different roles.
- (4) New business relationships.

<b>Deutsche Börse Group</b>	Page: 3 / 4
<b>Management of conflicts of interests</b>	Date: 2 January 2023

When identifying a situation where a (potential) conflict of interests cannot be avoided, relevant actions to manage, document and report must be taken:

- (1) Notify Group Compliance and for members of a board to committee to the respective body ensuring transparency.
- (2) Segregation of duties and business functions.
- (3) Recusal by or exclusion of the conflicted person or termination of the constellation for example by terminating a contract.
- (4) Controls and monitoring.
- (5) As a measure of last resort, disclosure to customers.

All the information of conflict of interests and respective mitigating measures defined, is documented and archived in a web-based IT application in accordance with respective data protection provisions. This database serves for employees to view and process their information for Group Compliance to document its assessments and monitoring and is the source for reporting to management bodies of DBG as well as to the competent authority. This reporting may take the form of conflict registers as required.

Employees shall contribute to identify, manage and document (potential) conflicts of interest. Employees should abstain from activities that compete with activities of DBG, from grasping any business opportunities to the detriment of CFCL or DBG. Employees may as a counterparty not enter into any contractual agreement with CFCL or DBG, regardless of the nature of the agreement, except if the respective line managers and Group Compliance formally approve such contractual arrangement or where the nature of such arrangement excluded any potential disadvantage of CFCL or DBG.

The policy and the register of conflict of interest are reviewed by the Compliance Department on a regular basis, validated by the Compliance Officer and submitted to the approval of the Executive Board during the management committee. The policy and the register are as well as reviewed by the Board of Directors on a regular basis and at least once a year.

<b>Deutsche Börse Group</b>	Page: 4 / 4
<b>Management of conflicts of interests</b>	Date: 2 January 2023

Published by

Clearstream Fund Centre  
S.A. Luxembourg  
[www.clearstream.com](http://www.clearstream.com)

Registered addresses  
Clearstream Fund Centre  
S.A.  
42 Avenue JF Kennedy  
L-1855 Luxembourg